

AUG 25 2010

Countywide Services Agency

**Department of
Human Assistance**

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County of Sacramento

August 16, 2010

Jim Tashima, Acting Chief
California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
Sacramento, CA 95814

Dear Mr. Tashima:

I would like to take this opportunity to thank you and your staff for coming to our office and sharing with us the findings of the Annual Civil Rights Compliance Review for 2010. The following section identifies areas found to be deficient during your review for compliance under the CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws and our plan for correction.

Civil Rights Compliance Review 2010

Summary of Findings and Corrective Action

III. DISSEMINATION OF INFORMATION

A. Findings

- The Bowling Green Office did not have the PUB 13 Braille, audio, or large print available in the lobby. The Pat Wright Building keeps the PUB 13 Braille, audio, and large print in a back room and not with clerical staff in the lobby.
- The Susie Gaines Building had an outdated 01/05 PUB 86 poster.
- The Rancho Cordova Office did not have the sign posted on the entrance door for office hours and the document drop-off directional sign located in the lobby into threshold languages: Spanish and Russian. The Susie Gaines Office did not have the instructional sign located at entrance translated in threshold language, Spanish. The Annex Building did not have the instructional signs posted in lobby windows translated into threshold language, Spanish.

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B. Corrective Actions

Informational Element	Correction Action Required
Auxiliary aids	Sacramento County DHA shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Posters	Sacramento County DHA shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211
Directional signage	Sacramento County DHA shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24

Corrective Action Plan

- The Bowling Green and Pat Wright offices now have the PUB 13 Braille, audio, and large print available in the lobby.
- The most recent version of PUB 86 (03/07) is now posted in the lobby of the Susie Gaines Building.
- The Rancho Cordova office has the sign posted on the entrance door for office hours and the document drop-off directional sign in the lobby in the threshold languages: Spanish and Russian. The DHA Translation Panel is working on translating the entrance instructional sign of Susie Gaines office and instructional signs posted in lobby windows of Annex building into Spanish language.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

A. Findings

Facility Location: Pat Wright Building, 1725 28th Street, Sacramento

Facility Element	Findings	Corrective Action
Parking	The "unauthorized parking" signage located at the 28 th St entrance does not have a contact number.	Additional sign shall be posted in conspicuous place at entrance to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133

	Length of accessible parking space access aisled short at 4ft 7in.	Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B/3.1, ADA 4.6.3) p135
Restroom	Men's: There was no accessible signage on the wall adjacent to the latch side of the door	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 281</p> <p>Raised characters shall be raised 1/32" minimum and shall be San Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 282</p>
	Door pressure is excessive at 15 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201
	Soap dispenser is high at 44 in.	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p 294
	Toilet tissue dispenser is located 16 in from front edge of toilet seat.	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301
	Women's: There was no accessible signage on the wall adjacent to the latch side of the door.	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p 281</p> <p>Raised characters shall be raised 1/32" minimum and shall be San Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p 282</p>
	Door pressure is	Interior Door will have 5 pounds maximum pressure.

	excessive at 17 lbs.	(CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201
	Toilet tissue dispenser is located 17 in from front edge of toilet seat.	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301
	Toilet tissue dispenser is too low at 17 in from floor.	Toilet paper dispenser minimum height from floor is 19". (CA T24 1115B.8.4, ADA 4.16.6) pp 295, 301

Corrective Action Plan

Parking

- The "unauthorized parking" signage has contact information.
- The work is in progress to repaint the length of accessible parking space access aisle to 5 feet. The work is scheduled to be completed by September 30, 2010.

Restrooms

- The men's restroom accessible signage is present on the wall adjacent to the latch side of the door.
- Door pressure on men's and women's restrooms has been adjusted to 5 pounds maximum pressure. DHA will continue to periodically check door pressure and take corrective actions as necessary.
- Property Management is currently working on correcting the height and length of soap and toilet tissue dispensers in men's and women's restroom. The work is scheduled to be completed by September 30, 2010.

Facility Location: Pat Wright Building – Annex, 1725 28th Street, Sacramento

Facility Element	Findings	Corrective Action
Main entrance	Clients are not allowed to enter through the door located by the parking lot off of 28 th and Q street. There was no directional sign posted by the door directing clients to the entrance around the corner.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394
	There was no ISA sign posted at the entrance.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to

	Door pressure is excessive at 21 lbs.	accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394 Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201 Force to open fire door, minimum allowable no to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 201
Client lobby	PUB 86 did not have the current contact information for the Civil Rights Coordinator (CRC).	PUB 86, dated 3/07, with current CRC information. (Div 21-107.211)

Corrective Action Plan

Main Entrance

- Temporary directional sign is posted by the door directing clients to the entrance around the corner. The permanent sign is on order and scheduled to be installed by September 30, 2010.
- The ISA sign is posted at the entrance.
- Door pressure was adjusted to maximum allowable limits. DHA will continue to periodically check door pressure and take corrective actions as necessary.

Client Lobby

- PUB 86, dated 3/07, was updated to current CRC contact information.

Facility Location: Susie Gaines Mitchell Building, 2450 Florin Road, Sacramento

Facility Element	Findings	Corrective Action
Parking	Signage on pavement in accessible spaces of wheelchair w/ occupant needs to be repainted. The words "NO PARKING" were not painted on pavement in access aisles.	Pavement signage shall be 36" x 36" minimum, white on blue in color, visible and centered. (CA T24 1129B.4.2) p 134 The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.3.2) p 135
Client lobby	PUB 86 was outdated, 01/05.	PUB 86, dated 3/07, withy current CRC information. (Div 21-107.211)
Restroom	Men's: Door pressure is excessive at 13 lbs.	Interior door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201

	Toilet tissue dispenser was located 14 in from front edge of toilet seat.	Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.8.4) pp 295, 301
	Women's: Door pressure is excessive at 15 lbs.	Interior door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201

Corrective Action Plan

Parking

- The Facility Manager is working with Property Management to repaint signage on pavement in accessible spaces of wheelchair with occupant needs. The work is scheduled to be completed by September 30, 2010.
- Property Management is in the process of painting "NO PARKING" words on pavement in access aisles. The work is scheduled to be completed by September 30, 2010.

Client Lobby

- PUB 86, dated 3/07, was updated to current CRC contact information.

Restroom

- Door pressure on men's and women's restrooms has been adjusted to 5 pounds maximum pressure. DHA will continue to periodically check door pressure and take corrective actions as necessary.
- Property Management is currently working on correcting the length of toilet tissue dispensers in men's restroom. The work is scheduled to be completed by September 30, 2010.

Facility Location: Bowling Green Building, 4433 Florin Road, Sacramento

Facility Element	Findings	Corrective Action
Parking	Entrance to off-street parking through the Home Depot parking lot did not have the "unauthorized parking" sign.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p 133
	The words "NO PARKING" need to be	The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access

	repainted in access aisles.	aisle in white letters no smaller than 12". (CA T24 1129B.3.2) p 135
Main entrance	<p>Door pressure is excessive at 15 lbs.</p> <p>There was no ISA sign posted at the entrance.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p 201</p> <p>Force to open fire door, minimum allowable no to exceed 15 pounds maximum. (CA T24 1133B.2.5, ADA 4.13.11(1)) p 201</p> <p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394</p> <p>Characters, symbols and their backgrounds have a non-glare finish. Characters and symbols contrast with their background, either light characters on a dark background or dark characters on a light background. (CA T24 1117B.5.2, ADA 4.30.5) p 396</p>
Client interview rooms	Interview rooms are not accessible. Wheelchair turning space in rooms is too narrow.	Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p 236
Restroom	<p>Men's: Door pressure is excessive at 15 lbs.</p> <p>Women's: Door pressure is excessive at 15 lbs.</p>	<p>Interior door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p> <p>Interior door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p 201</p>

Corrective Action Plan

Parking

- The Facility Manager is working with Property Management to post the "unauthorized parking" sign at the entrance to off-street parking through the Home Depot parking lot. The work is scheduled to be completed by September 30, 2010.
- Property Management is in the process of repainting "NO PARKING" words in access aisles. The work is scheduled to be completed by September 30, 2010.

Main Entrance

- The door pressure was adjusted to 5 pounds maximum. DHA will continue to periodically check door pressure and take corrective actions as necessary.
- Temporary ISA sign is posted at the entrance. The permanent sign is on order and scheduled to be installed by September 30, 2010.

Client Interview Rooms

- The Facility Manager is assessing the interview rooms for reconfiguration to allow wheelchair turning space to turn 180 degrees in a 60-inch diameter space.

Restrooms

- The door pressure in the men's and women's restrooms has been adjusted to 5 pounds maximum pressure. DHA will continue to periodically check door pressure and take corrective actions as necessary.

B. Recommendation

There was a "Drop-Box" located near the entrance into the lobby. This is not accessible as it is located too high. It is recommended the box be lowered to a maximum of 40" making it accessible.

Corrective Action Plan

The Civil Rights Bureau's recommendation has been submitted to the Projects Committee to lower the document drop-box to a maximum of 40 inches making it accessible. The permanent sign is on order and scheduled to be installed by September 30, 2010.

VII. STAFF DEVELOPMENT AND TRAINING

A. Findings

Not all staff interviewed were aware of the policy and procedure for a discrimination complaint.

B. Corrective Actions

Training Area	Corrective Action
Division 21, Civil Rights Training	Sacramento County Department of Human Assistance shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. Div. 21-117.1

Corrective Action Plan

The Civil Rights Coordinator along with Staff Development Office will put a greater emphasis on policy and procedure for a discrimination complaint during the Civil Rights Training at the Induction Class and the mandatory annual training.

VIII. DISCRIMINATION COMPLAINT PROCEDURE

A. Findings

Six out of 16 staff interviewed were not aware of what a civil rights or program complaint was and could not identify what the procedure is to file a complaint.

Three out of 16 staff interviewed were not aware that Dan Peak was the current Civil Rights Coordinator during the civil rights review.

B. Corrective Actions

Element	Corrective Action
Discrimination Process	Sacramento County Department of Human Assistance shall ensure that staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. Div. 21-117.1
Civil Rights Coordinator	Sacramento County Department of Human Assistance shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. Div. 21-117 and 21-107.21

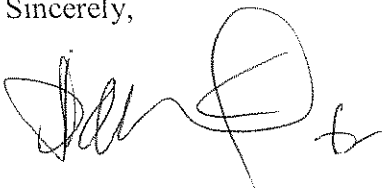
Corrective Action Plan

The Civil Rights Coordinator along with Staff Development Office will put a greater emphasis on policy and procedure for a discrimination and program complaints during the Civil Rights Training at the Induction Class and the mandatory annual training.

The Civil Rights Coordinator has changed four times within the last year which caused some confusion among staff. The Announcement Bulletin was posted for all DHA employees of current CRC contact information, including the internet and intranet locations.

Once again, on behalf of our staff, I thank you for your assistance in helping DHA to achieve compliance with Division 21 regulations. If there is any further information required regarding this Corrective Action Plan, please contact Alexander Kurdyumov at (916) 648-0368. For future communication regarding civil rights concerns please contact Mary E. Shuba, Civil Rights Coordinator, at (916) 648-0363.

Sincerely,



Paul G. Lake, Interim Director

c: Mary E. Shuba, Civil Rights Coordinator